

Exhibit G

From: [Faherty, Colleen](#)
To: [Robinson, Amy \(LAW\)](#); [Weiss, Dara \(Law\)](#)
Cc: [AG-NYPDLitigation](#); [wood@klflaw.com](#); [Sow-Legal@blhny.com](#); [SierraTeam@moskovitzlaw.com](#); [PayneLitigationTeam@nyclu.org](#); [dlieb](#); [Andrew Stoll](#)
Subject: RE: People v. City of NY - 9/2/2021 Capt. Treubig Deposition - webex link
Date: Tuesday, October 26, 2021 5:18:48 PM

Dear counsel,

This is the third unexplained cancellation of Sgt. Saleh's deposition—an examination that has been outstanding since July. Separate and apart, however, the documents from Sgt. Saleh should have been prepared as far back as July and we can see no basis for the continued delay in production. Please produce those items immediately.

Finally, we intend to seek court intervention to order this deposition. We cannot continue to waste valuable resources on preparations that are subsequently cancelled last minute. Indeed, there are costs associated with cancelling the court reporter.

Regards,
Colleen

Colleen K. Faherty | Assistant Attorney General
Executive Division – Federal Initiatives
New York State Office of the Attorney General
28 Liberty Street, 18th floor | New York, NY 10005
Tel: 212.416.6046 | Fax: 212.416.6009
Colleen.Faherty@ag.ny.gov

From: Robinson, Amy (LAW) <arobinso@law.nyc.gov>
Sent: Tuesday, October 26, 2021 4:18 PM
To: Faherty, Colleen <Colleen.Faherty@ag.ny.gov>; Weiss, Dara (Law) <daweiss@law.nyc.gov>
Cc: AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; wood@klflaw.com; Sow-Legal@blhny.com; SierraTeam@moskovitzlaw.com; PayneLitigationTeam@nyclu.org; dlieb <dlieb@klflaw.com>; Andrew Stoll <astoll@stollglickman.com>
Subject: Re: People v. City of NY - 9/2/2021 Capt. Treubig Deposition - webex link

Counsel,

We unfortunately have to cancel Sgt. Saleh's deposition as we are currently unable to reach him.

Regards,

Amy Robinson
Senior Counsel
New York City Law Department
Special Federal Litigation Division
100 Church Street
New York, NY 10007
(212) 356-3518
arobinso@law.nyc.gov

From: Faherty, Colleen <Colleen.Faherty@ag.ny.gov>
Sent: Tuesday, October 26, 2021 9:26 AM
To: Robinson, Amy (LAW) <arobinso@law.nyc.gov>; Weiss, Dara (Law) <daweiss@law.nyc.gov>
Cc: AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; wood@klflaw.com <wood@klflaw.com>;
Sow-Legal@blhny.com <Sow-Legal@blhny.com>; SierraTeam@moskovitzlaw.com
<SierraTeam@moskovitzlaw.com>; PayneLitigationTeam@nyclu.org
<PayneLitigationTeam@nyclu.org>; dlieb@klflaw.com>; Andrew Stoll
<astoll@stollglickman.com>
Subject: [EXTERNAL] RE: People v. City of NY - 9/2/2021 Capt. Treubig Deposition - webex link

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Counsel,

By now you should have separately received the webex invitation to Thursday's deposition of Sgt. M. Saleh, beginning at 9:30 a.m. In an abundance of caution, I have also copied the webex details below.

Dara and Amy,

Please also confirm that the City will produce the following documents for Sgt. M. Saleh today:

1. NYPD training transcript
2. CCRB History
3. IAB History
4. CPI
5. List of Schedule A protests the deponent attended
6. Activity logs from each of the Schedule A protests the deponent attended
7. BWC footage from each of the Schedule A protests the deponent attended
 - i. A person named Justin Ware was arrested at the 5/30/20 FDR protest where Payne plaintiff Vidal Guzman was present and according to CCRB

records, it appears there is BWC footage of Ware's arrest exists—please produce this to us immediately—*See CCRB_00007515*, POs present: PO Harold Ogando; the digital file linked to this record is:

202003773_20201027_1754_DMI.PDF;

202003773_PDF_202003773_20201027_1801_DMI.PDF,"Digital Record Type: Police Documents (with receipts)

8. Arrest/OLBS reports the deponent created during the relevant time period
9. Summonses the deponent created during the relevant time period
10. DAT's the deponent created during the relevant time period
11. AIDED reports related to the deponent during the relevant time period
12. Medical Treatment of Prisoner forms
13. TRI reports related to the deponent during the relevant time period
14. Any other documents you reviewed with Sgt. Saleh to prepare him for his deposition

Kindest regards,
Colleen

Colleen K. Faherty | Assistant Attorney General

Executive Division – Federal Initiatives

New York State Office of the Attorney General

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[EXTERNAL]

Colleen Faherty is inviting you to a scheduled Webex meeting.

Thursday, October 28, 2021

9:30 AM | (UTC-04:00) Eastern Time (US & Canada) | 8 hrs

[Join meeting](#)

More ways to join:

Join from the meeting link

<https://nyoag.webex.com/nyoag/j.php?MTID=m9c53519b53a088202b994c8626e911ca>

Join by meeting number

Meeting number (access code): 2431 577 8095

Meeting password: 9ZxMMPkH7M4

Tap to join from a mobile device (attendees only)

[+1-415-655-0002,,24315778095##](tel:+1-415-655-0002,,24315778095##) US Toll

Join by phone

+1-415-655-0002 US Toll

[Global call-in numbers](#) | [Toll-free calling restrictions](#)

Join from a video system or application

Dial 24315778095@nyoag.webex.com

You can also dial 173.243.2.68 and enter your meeting number.

Need help? Go to <https://help.webex.com>

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